

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

SYMBOLGY INNOVATIONS, LLC,)	
)	
<i>Plaintiff,</i>)	
)	C.A. No. 1:19-cv-04474
v.)	
)	
NATURAL NECTAR, INC.,)	DEMAND FOR JURY TRIAL
)	
<i>Defendant.</i>)	
)	
)	

**PLAINTIFF SYMBOLGY INNOVATIONS, LLC’S REQUEST FOR A CLERK’S
CERTIFICATE OF DEFAULT**

Pursuant to Federal Rule of Civil Procedure 55(a) and Local Civil Rule 55.1, Plaintiff Symbolgy Innovations LLC (“Symbolgy” or “Plaintiff”) respectfully requests that the Clerk of the Court enter the default of Defendant Natural Nectar, Inc. (“Natural Nectar” or “Defendant”). In support of this request, Symbolgy Innovations, LLC shows the following:

1. The clerk issued a summons to Natural Nectar on August 6, 2019 (Dkt. 5). On September 4, 2019 Natural Nectar was served on the corresponding registered agent, and the proof of service was filed with the court shortly thereafter on September 12, 2019 (Dkt. 5). *See* Dkt. 7, p. 2, Affidavit of Proof of Service.

2. Pursuant to Federal Rules of Civil Procedure 4(d) and 12 and the court’s docket notice in Dkt. 7, Natural Nectar was required to answer or otherwise respond by September 26, 2019.

3. To date, Natural Nectar has not filed an Answer to Symbolgy’s Complaint, and

no attorney has made an appearance on behalf of Natural Nectar. No attorney has otherwise contacted Symbology or its attorneys to discuss an extension to respond to the Complaint.

Therefore, Symbology requests that the Clerk of the Court enter the default of Natural Nectar for failure to file an Answer. An affirmation in support of Plaintiff's request for a certificate of default and a proposed Clerk's Certificate of Default Form are included herewith pursuant to Local Civil Rule 55.1.

Dated: October 17, 2019

Respectfully submitted,

/s/Stamatios Stamoulis

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